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DOE-FMPC HAMILTON COUNTY HAZARDOUS WASTE PIT FOUR CLOSURE

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State of Ohio Environmental Protection Agency

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Southwest District Office

40 South Main Street Dayton, Ohio 45402-2086 (513) 285-6357 FAX (513) 285-6249

George V. Voinovich Governor

May 1, 1991

RE: DOE-FMPC

HAMILTON COUNTY HAZARDOUS WASTE PIT FOUR CLOSURE

Mr. Gerald W. Westerbeck FMPC Site Manager P.O. Box 398705 Cincinnati, Ohio 45239-8705

Dear Mr. Westerbeck:

On October 19, 1990, you submitted an Amendment to the Waste Pit Four Closure Plan which would allow the collection of samples in Pit Four as part of current RI/FS activities. The Ohio EPA has now decided that this activity would not constitute an amendment to the plan, but rather will be considered a revision of this plan.

However, Ohio EPA requests resolution of a couple of concerns prior to the activities occurring at Pit Four. The concerns are as follows:

- 1. The work plan attached to the amendment indicates that an auger drilling rig will be used for borehole placement. The plan does not mention the size of this piece of equipment. Ohio EPA is concerned that the rig will damage the integrity of the liner. Please submit information which demonstrates that the rig can be used on Pit Four without damaging the integrity of the liner.
- 2. The work plan does not discuss the repair of the liner after sample collection. Again, Ohio EPA is concerned that the integrity of the liner will be breached if repair work is not completed properly. Please submit information which demonstrates that the liner will be repaired adequately upon completion of sampling.

Ohio EPA requests that upon completion of the sampling event, the liner be subject to an integrity assessment, preferably by the contractor responsible for initial installation. Absent this, DOE-FMPC should have an independent professional engineer conduct this assessment.

Please submit in writing the demonstrations requested in 1 and 2 above, and DOE's intent to comply with the request for an integrity assessment.

Please call me at (513) 285-6357 if you have any questions or comments.

Sincerely,

Paul D. Pardi

Hazardous Waste Group Leader

PDP/kli

cc: Graham Mitchell, FMPC Site Coordinator, SWDO

MAY 0.3. 1991

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